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VIA ELECTRONIC FILING

The Honorable Christopher J. Burke
U.S. District Court for the District of Delaware
J. Caleb Boggs Federal Building
844 N. King Street
Wilmington, DE 19801-3556

Re: *The Nielsen Company (US), LLC v. TVision Insights, Inc.*, C.A. No. 22-1345-CJB

Dear Judge Burke,

Pursuant to the Court's Order dated January 16, 2025 (D.I. 112), the parties respectfully submit the attached proposed dates for a revised schedule to be utilized if the Court decides to lift the stay of this action and decides to enter a scheduling order before entering a decision on Nielsen's forthcoming renewed motion to dismiss Defendant's Counterclaim.¹ The parties maintain their disagreement as to whether the Court should enter any scheduling order at all at this point, for the reasons set forth in their prior letter, D.I. 111. The parties agree that the procedures (but not the dates) in the previous Scheduling Order, D.I. 17, will apply to the extent the Court lifts the stay, except that the limits in paragraphs 7.c and 7.e.i. are stricken and the limits imposed by the Federal Rules of Civil Procedure shall apply.

Respectfully,

/s/ David E. Moore

David E. Moore

DEM:rms/12014153 / 14944.00004

cc: Counsel of Record (via electronic mail)

¹ Should the Court lift the stay pending appeal of the Final Written Decision in IPR2023-01014, Nielsen intends to immediately renew its Motion to Dismiss Defendant's Counterclaim.